1 JENNIFER BERGH Nevada Bar No. 14480 2 **QUILLING SELANDER LOWNDS** WINSLETT & MOSER, P.C. 3 6900 N. Dallas Parkway, Suite 800 Plano, Texas 75024 4 Telephone: (214) 560-5460 5 Facsimile: (214) 871-2111 jbergh@qslwm.com 6 COUNSEL FOR TRANS UNION LLC 7 **Designated Attorney for Personal Service** Trevor Waite, Esq. 8 Nevada Bar No.: 13779 9 6605 Grand Montecito Parkway, Suite 200 Las Vegas, Nevada 89149 10 IN THE UNITED STATES DISTRICT COURT 11 FOR THE DISTRICT OF NEVADA 12 DOLORMYLENE C. PINOLIAR, Case No. 2:20-cv-00698-APG-VCF 13 Plaintiff, JOINT MOTION AND ORDER 14 EXTENDING DEFENDANT TRANS UNION LLC'S TIME TO FILE AN 15 WELLS FARGO HOME MORTGAGE and ANSWER OR OTHERWISE RESPOND TRANSUNION, LLC, 16 TO PLAINTIFF'S COMPLAINT Defendants. 17 (FIRST REQUEST) 18 Plaintiff Dolormylene C. Pinoliar ("Plaintiff") and Defendant Trans Union LLC ("Trans 19 Union"), by and through their respective counsel, file this Joint Motion Extending Defendant 20 Trans Union's Time to File an Answer or Otherwise Respond to Plaintiff's Complaint. 21 On April 17, 2020, Plaintiff filed her Complaint. The current deadline for Trans Union to 22 answer or otherwise respond to Plaintiff's Complaint is May 14, 2020. The allegations in 23 Plaintiff's Complaint date back to November 2018. Trans Union's counsel continues to review 24 the allegations of the Complaint and requires additional time to respond to the same in a 25 Trans Union further seeks this extension because of the challenges meaningful fashion. 26 experienced due to Covid-19 in hampering the ability to appropriately respond to the Complaint. 27 Trans Union requires additional time to locate and assemble the documents relating to Plaintiff's 28 allegations, any disputes Plaintiff submitted to Trans Union, and Trans Union's investigation of

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any such disputes. Further, Trans Union's counsel will need additional time to review the 1 2 documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made 3 in good faith and not for the purposes of delay. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or 4 otherwise respond to Plaintiff's Complaint up to and including June 4, 2020. This is the first 5 motion for extension of time for Trans Union to respond to Plaintiff's Complaint. 6 Dated this 12th day of May 2020. 7 8 /s/ David H. Krieger /s/ Jennifer Bergh 9 DAVID H. KRIEGER JENNIFER BERGH 10 dkrieger@kriegerlawgroup.com jbergh@qslwm.com Krieger Law Group, LLC Nevada Bar No. 14480 11 2850 W. Horizon Ridge Blvd., Suite 200 **QUILLING SELANDER LOWNDS** Henderson, NV 89052 WINSLETT & MOSER, P.C. 12 (702) 848-3855 2001 Bryan St., Suite 1800 Dallas, TX 75201 and 13 (214) 560-5460 Matthew I Knepper 14 Matthew.knepper@knepperclark.com (214) 871-2111 Fax Counsel for Trans Union LLC Miles N. Clark 15 miles.clark@knepperclark.com Knepper & Clark LLC 16 5510 So. Fort Apache Rd., Suite 30 Las Vegas, NV 89148 17 (702) 856-7430 18 (702) 447-8048 Fax Counsel for Plaintiff 19 IT IS SO ORDEREJ 20 21 22 HONORABLE CAM FERENBACH UNITED STATE MAIGSTRATE JUDGE 23 24 Dated this 13th day of May, 2020 25 26 27 28